



*Via Email*

Mike Foley

Director of Sustainability

Cuyahoga County Department of Sustainability

2079 E. 9th Street, 8th Floor

Cleveland, Ohio 44115

Dear Director Foley,

Thank you for your efforts to bring sustainable and affordable transportation to Cuyahoga County and for the opportunity to comment on the license application. We are pleased to see that the Office of Sustainability is leading the policy formulation for this mode of transportation as Bird shares the goals of reducing carbon emissions and promoting clean transportation in our communities. In fact, in just our first year of our service, cities across the world have found that Bird rides eliminated millions of car trips from their streets, accounting for more than 12 million pounds of carbon emissions avoided. To that end, we are excited to work with the County and the municipalities within it to help reach the region's goals of car trip replacement and reduced congestion.

When evaluating the County's proposed licensing application, we want to emphasize that avoiding duplicative regulation on the city and county level is our primary concern. We are not aware of any precedent elsewhere in the United States involving county regulation on top of city regulation. As such we are appreciative of the County's efforts since the development of the first iteration of regulations to further coordinate with cities on a shared mobility program. To eliminate potentially conflicting regulatory structures, we would respectfully suggest as a matter of implementation that where the City and the County address the same topic, the City regulations should prevail. We understand this is consistent with Ohio state law. Such an approach will help guide our business operations going forward by establishing a clear principle in cases of potentially inconsistent regulations.

For example, Bird believes companies who avail themselves of the public right of way have a responsibility to give back to the city and pay for the reasonable and necessary costs of administering a shared mobility program as well as contributing to the establishment of safe infrastructure. However, if such costs are covered by a per ride fee charged by the city, there should not be an additional per ride fee on the County level. Our ability to offer affordable transportation to neighborhoods across the county is directly linked to our costs of operation. Higher and duplicative fees make this goal more difficult to achieve by potentially driving up the cost of our services for residents and limiting our operational scope.

Again, thank you for the opportunity to comment on the proposed licensing application and we look forward to working with you to promote clean and sustainable transportation across Cuyahoga County.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Cooper". The signature is written in a cursive, flowing style.

Sam Cooper